

CODE OF ETHICS

PREAMBLE

As a recipient of charitable contributions, Goodwill recognizes its responsibility to ensure that funds and contributions received are used to further its mission and to safeguard the assets of the corporation. In order to uphold the highest standards and ensure the integrity, honesty and reputation of the entirety of the Goodwill movement, we agree to voluntarily comply with the following Code of Ethics and related Financial Reporting and Management Practices.



CODE OF ETHICS

We affirm our commitment to the following Code of Ethics based on the values and culture of Goodwill. As Officers, Employees, or Volunteers, we pledge to follow both the letter and the spirit of the following Code:

Business Practices:

- We agree to engage in and promote honest and ethical conduct.
- We will strive to avoid actual or the appearance of conflicts of interest.
- We will comply with applicable laws, rules, and regulations of federal, state, and local governments.
- We will responsibly use and control all assets, resources, and information in our possession.
- We will encourage the prompt reporting of any violations of this Code of Ethics or other governing documents.
- We will use restricted monies for requested, specific purpose. We will be able to account for activity and show how the funds were used.

Marketing, Communications, and Development Activities:

- We will practice honest, transparent, and timely communication to facilitate the free flow of essential information in accord with the public interest.
- We will ensure that all services and products are promoted in a manner that promotes respect for our employees and the people receiving services, as well as sensitivity to cultural values and beliefs.
- We will protect confidential information and comply with all legal requirements for disclosure of information affecting the welfare of others.
- We will protect the privacy of our employees and will only disclose information about them as permitted or required by law.
- We will protect the privacy of people served and use their stories only with their expressed and written permission.
- We will disseminate accurate information and promptly correct any erroneous communication for which we may be responsible.

Professional Responsibilities:

- We are committed to continually improving our relationship with our stakeholders (public, employees, and people we serve).
- We will respect all resources provided to meet the needs of the organization and those that we serve.
- We will not discriminate because of race, color, creed, disability, or national origin, and we shall endeavor to eliminate or prevent discrimination in rendering services.
- We will treat one another, persons served, customers, donors, vendors, guests, and volunteers with dignity and respect.

Service Delivery:

- We will maintain the confidentiality of information regarding persons served. We will not discuss confidential company, employee, or information on persons served unless related to job responsibilities.
- We will strive to provide quality services at all times.
- We will strive to avoid any real or perceived conflicts of interest and will make arrangements for alternative services, as needed.
- We will prohibit the exchange of gifts, money, and gratuities between employees and persons served and discourage same among persons served.
- We will prohibit personal fund raising in the workplace (i.e.-kids candy). We may support other agencies who have related missions or have been impacted by disasters.
- We will discourage bringing personal property to the workplace, especially items of religious or political nature, which may be offensive to others not sharing similar views.
- We strongly support the setting of professional boundaries between employees and person served; while honoring a friendly and respectful provider/customer relationship.
- We limit and vest authority of witnessing documents pursuant to persons served to those designated by the President & CEO of the organization.

Human Resources:

- Through on-going professional development and continuing education, we will strive to remain current with our skills and abilities relevant to the services we offer.
- We are committed to diversity within our workforce to effectively meet the needs of the people we serve.
- We are committed to providing a safe, drug-free, and healthy working environment, supporting our Mission, Values, and Corporate Culture.

FINANCIAL REPORTING AND BUSINESS MANAGEMENT PRACTICES

We recognize that financial reporting and an integrated system of internal controls are key responsibilities of our President & CEO and Chief Financial Officer. We believe that periodic review of our financial status by our Board of Directors is essential and an integral part of their duties. We further recognize that an annual independent examination and assessment of our finances under the supervision of our Finance and Audit Committee is a key element in maintaining our credibility and ensuring the safeguarding of our assets.

Financial Statements: We reaffirm our responsibility to report the financial position and results of operations and cash flow of the organization in accordance with generally accepted accounting

principles through financial statements to our Finance and Audit Committee and Board of Directors at least quarterly.

Internal Controls: We have an integrated system of internal control, designed to provide reasonable assurances that we will attain the following:

- Effectiveness and efficiency of operation, including the safeguarding of assets
- Reliable financial statements
- Compliance with applicable laws and regulations

We will provide an annual assessment of the internal control system to our Finance and Audit Committee and Board of Directors.

Annual Audit: We will engage an independent accounting firm to conduct an examination of our financial statements. The independent accounting firm will conduct its audit in accordance with generally accepted accounting and auditing principles (GAAP). The financial statements of the Corporation shall be audited annually by a firm of independent certified public accountants who shall be chosen by the Board of Directors. To avoid conflict of interest, the President & CEO, Chief Financial Officer, or any other member of the Board cannot have worked for the auditing firm at least one year preceding the audit. The auditor or auditing firm or at least the lead and reviewing partners are rotated at least every 5 years. The auditors will examine our financial statements and internal control assessment and report on their examination and recommendations for changes in the financial statements, reporting practices, or internal controls. This report will be provided directly to our Finance and Audit Committee and Board of Directors.

Finance & Audit Committee: This committee shall be comprised of at least three members of the Board of Directors who are nominated by the Chairperson and appointed by the Board. All members of the Finance and Audit Committee will be independent from management, financially literate, and at least one member will have accounting or related financial management expertise. It shall be the duty of this Committee to: a) provide oversight and generally monitor the fiscal condition and solvency of the Corporation and effective use of the Corporation's resources; b) examine the budget prepared by the President & CEO prior to its submission to the Board of Directors; c) safeguard the assets of the Corporation through the procurement of insurance with appropriate levels of coverage; and d) oversight responsibilities relating to the auditing, accounting, and reporting practices of the Corporation, the adequacy of the Corporation's systems of internal controls, and the Corporation's legal and financial compliance with applicable laws and regulatory requirements.

Contractual Relationships: Goodwill Industries of Arkansas will maintain its relationships with individuals and entities with whom it has established or is considering establishing a contractual relationship in a legal and ethical manner. Conflicts of interest with any current or potential bidders must be declared. A copy of the Code of Ethics for Goodwill shall be provided to all Contractors during the bidding process and they will be required to adhere to the Code upon contract award. The President & CEO, along with the Chief Financial Officer and Chief Operating Officer, are the only individuals who have authoritative responsibility for negotiating and signing contracts and contingencies for Goodwill Industries of Arkansas. No other employee has the authoritative right to negotiate or sign contracts unless specifically designated by the President & CEO.

Whistle Blower Protection: In accordance with laws governing both for profit and nonprofit corporations, we have or will adopt a whistle blower policy and procedures, which will encourage employees to report any financial improprieties. Employee reports of improprieties will be taken seriously and investigated promptly. Employees bringing such reports will not be subject to retaliation or adverse action based on the disclosure of the complaint.

Goodwill is committed to the establishment, implementation, and maintenance of a corporate compliance program to ensure ongoing monitoring and compliance with all legal and regulatory requirements. The program will emphasize:

Prevention of wrong doing- whether intentional or unintentional: Immediate reporting and investigation of questionable activities and practices without consequences to the reporting agency and; timely correction of any situation that puts Goodwill, its leadership or staff, funding sources or persons served at risk.

Employees have the responsibility to report any wrongdoing to the Chief Operating Officer (COO). Any employee may call the EthicsPoint hotline (1-866-ETHICSP (384-4277) to report issues of fraud, waste and/or abuse. This allows for the anonymity of the caller. The Chief Operating Officer will proceed as appropriate.

Conflict of Interest: We have a conflict of interest policy governing our board members, officers, employees, and volunteers. We agree that a conflict of interest arises when a board member, officer, volunteer, or employee is influenced by personal considerations, including but not limited to financial considerations, in the course of performing work for Goodwill. All board members, officers, employees, and volunteers should disclose any activity or relationship at a specific planned time, which may be perceived as a conflict of interest, and a record of that disclosure should be maintained.

Document Destruction: We have adopted a written, mandatory document retention and destruction policy based on legal requirements. By law, certain documents, such as- financial records, contracts, real estate, and employee records, must be archived according to specific guidelines. The policy will also state it is illegal to alter, cover up, falsify, or destroy any document to prevent its use in an official proceeding such as a federal investigation. The policy will include guidelines for electronic mail and voice mail.

Certification of Form 990: We agree that both the President & CEO and the Chief Financial Officer of Goodwill will sign Internal Revenue Service Form 990 to attest to the accuracy and completeness of its contents as well as to the accuracy of financial reports utilized during the year and in preparation of the Form 990. The Financial statements and Form 990 will not contain any untrue material statements for facts and will not be misleading in their presentation.

CONDUCT IN REGARD TO FISCAL MANAGEMENT

The conduct of all board members, employees, volunteers, and officers of Goodwill has an impact on our ability to manage our financial resources and serve the community. In order to strengthen our ability to comply with the Code of Ethics and Principles in this document, we will ask each member

of the staff, board, or other volunteer groups to agree to conduct himself or herself in a manner that promotes Goodwill's corporate culture, values and ethical behaviors that include:

- Operating in a manner that upholds the integrity of the movement and ensures public trust.
- Upholding all applicable laws and regulations, and furthering the ability of Goodwill to accomplish our mission.
- Being a responsible steward of the resources of our Goodwill.
- Recognizing if you are being asked to do something that might be illegal, immoral, or unethical.
- Consulting others if you are presented with a dilemma on an issue.
- Deciding on a course of action, determining your responsibility, reviewing all relevant facts and information, and referring to all applicable Goodwill policies or professional standards.
- Considering whether an action goes against legal, ethical, moral, and professional standards.

Training/Education:

- **Employee:** Each employee will receive initial training on the Code of Ethics as part of his or her orientation process. Each employee will be encouraged to ask questions throughout the training to ensure that he/she understands the Code. Each employee will complete and sign the Goodwill Code of Ethics Certificate. A copy of which will be maintained in their personnel file. There will be an annual refresher training provided, either directly or via email, with particular alerts to modifications to the Code.
- **Board:** Each board member will be provided with a copy of the Code of Ethics policy at the time of their initial orientation to the board. A copy of the Code of Ethics will be maintained in the board manual.
- **Public:** A copy of the Code of Ethics will be posted on the agency web site.

Procedures to Deal with Allegations of the Code:

- **Employees:** Employees have the responsibility to report violations of the Code of Ethics. We strongly encourage the employee to inform their supervisor as the first option for reporting, unless the supervisor is directly involved in the misconduct. Employees may also report misconduct by calling the EthicsPoint Hotline number (1-866-ETHICSP (384-4277) or by private email at www.ethicspoint.com.

The Chief Operating Officer will handle all corrective action for violation of the Code. The following circumstances may be considered:

- The employee has promptly reported his/her own violation.
- The employee cooperates fully in the investigation and correction of the violation.
- **Board:** Board members should report any suspected violation of the Code to the Board Chair who will discuss the matter with the President & CEO. The Board Chair will discuss the issue with the individual board member and interview other appropriate parties. The issues and recommendations will be brought forth to the Executive Committee.
- The community and people we serve trust Goodwill based on its long-established reputation and integrity. Any misdeed, illegal activity, or appearance of impropriety impacts negatively upon all of us. In order to maintain that trust, we agree to voluntarily comply with the guidelines and recommendations set forth in the document.